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14 UNITED STATES DISTRICT COURT

15 NORTHERN DISTRICT OF CALIFORNIA — SAN FRANCISCO DIVISION

16 RHODORA CRISTOBAL,

17 Plaintiff,

18 vs.

19 EQUIFAX, INC.; et. al.,

20 Defendants.

Federal Case No.: 3:16-cv-06329-JST

**STIPULATION OF DISMISSAL WITH
PREJUDICE OF DEFENDANT
JPMORGAN CHASE BANK, N.A.;
[PROPOSED] ORDER**

21 IT IS HEREBY STIPULATED by and between plaintiff Rhodora Cristobal and
22 defendant Chase Bank USA, N.A. (erroneously sued as JPMorgan Chase Bank, N.A., and
23 referred to herein as “Chase”), through their designated counsel, that Chase be dismissed with
24 prejudice from the above-captioned action pursuant to Federal Rules of Civil Procedure, Rule
25 41(a)(2). As a condition of entering into this stipulation, Chase is reserving its rights to file,
26 within 30 days from the date of this stipulation, a motion to recover its attorneys’ fees and costs
27 incurred in connection with its defense of this action.

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3 DATED: October 9, 2017

Sagaria Law, P.C.

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5 By: /s/ Elliot W. Gale
Elliot W. Gale

6 Attorneys for Plaintiff
7 Rhodora Cristobal

8 DATED: October 9, 2017

Covington and Burling LLP

9
10 By: /s/Megan Rodgers
Megan Rodgers

11 Attorneys for Defendant
12 Chase Bank USA, N.A. (erroneously sued as JPMorgan
13 Chase Bank, N.A.)
14

15 I, Elliot Gale, am the ECF user whose identification and password are being used to file this
16 Stipulation. I hereby attest that Megan Rodgers has concurred in this filing.
17 /s/ Elliot Gale

18 **[PROPOSED] ORDER**

19
20 Pursuant to the stipulation of the Parties, Chase is dismissed with prejudice from the
21 above-captioned action.

22 IT IS SO ORDERED.

23 DATED: October 10, 2017

24 
JON S. TIGAR
25 UNITED STATES DISTRICT JUDGE
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